

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

AD HOC COMMITTEE OF NON-US
CUSTOMERS OF FTX.COM,

Plaintiffs,

v.

FTX TRADING, LTD., *et al.*

Defendants.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Adv. Pro. No. 22-50514 (JTD)

Ref. No. 1

STIPULATION EXTENDING TIME TO RESPOND TO THE COMPLAINT

This stipulation (the “Stipulation”) is entered into by and between FTX Trading Ltd., and its affiliated debtors and debtors-in-possession (collectively, the “Debtor Defendants”)² and the Ad Hoc Committee of Non-US Customers of FTX.com (the “Plaintiffs,” and together with the Debtors, the “Parties”). The Parties, by and through their undersigned counsel, hereby stipulate and agree as follows:

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063, respectively. Due to the large number of debtor entities in these chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Each of the Debtors in these Chapter 11 Cases is named as a Defendant in this Complaint. A list of the Debtor Defendants is listed in Exhibit A of the Complaint [Adv. D.I. 1].

RECITALS

WHEREAS, on November 11, 2022 and November 14, 2022, the Debtors commenced cases under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”). These Chapter 11 Cases are pending in the United States Bankruptcy Court for the District of Delaware (the “Court”) and are being jointly administered under Case No. 22-11068 (JTD);

WHEREAS, on December 28, 2022, the Plaintiffs filed an *Complaint for Declaratory Judgment* commencing the above-captioned adversary proceeding [Adv. D.I. 1] (the “Complaint”);

WHEREAS, on December 29, 2022, the Plaintiffs served the Complaint on the Debtor Defendants;

WHEREAS the Parties have agreed that the Debtor Defendants’ response deadline shall be extended to February 10, 2023.

NOW, THEREFORE, IT IS STIPULATED THAT:

1. The Parties agree that the time for the Debtor Defendants to answer, move or otherwise respond to the Complaint is extended to February 10, 2023, which may be further extended by agreement of the Parties or order of the Court.

2. The Parties, by and through their undersigned counsel, each represent and warrant that the undersigned is fully authorized and empowered to execute and deliver this Stipulation on behalf of, and to bind, each Party, as applicable, to the terms and conditions of this Stipulation.

3. This Stipulation may be executed in any number of counterparts, and each such counterpart is to be deemed an original for all purposes, but all counterparts shall collectively constitute one agreement. Further, electronic signatures or transmissions of an originally signed document by facsimile or electronic mail shall be as fully binding on the Parties as an original document.

Dated: January 31, 2023
Wilmington, Delaware

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Dated: January 31, 2023
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